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11-CV-00222-BOND

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

V.

JOHN DOES 1-11 CONTROLLING A COMPUTER BOTNET THEREBY INJURING MICROSOFT AND ITS CUSTOMERS.

Defendants.

Case No. C11-0222 JAS

COMPLAINT

****FILED UNDER SEAL****

Plaintiff MICROSOFT CORP. (“Microsoft”) hereby complains and alleges that JOHN DOES 1-11 (“Defendants”) are controlling an illegal, notorious, and world-wide computer network known as the “Rustock botnet,” made up of end-user computers connected to the Internet, which Defendants have infected with malicious software, and which Defendants consequently can and do direct and control for nefarious and illegal purposes through servers connected to the Internet.

NATURE OF ACTION

1. This is an action based upon: (1) the Computer Fraud and Abuse Act (18 U.S.C. § 1030), (2) CAN-SPAM Act (15 U.S.C. § 7704), (3) trademark infringement under the

COMPLAINT

Orrick Herrington & Sutcliffe LLP
701 5th Avenue, Suite 5600
Seattle, Washington 98104-7097
tel: 1-206-839-4300

1 Lanham Act (15 U.S.C. § 1114), (4) false designation of origin under the Lanham Act (15
 2 U.S.C. § 1125(a)), (5) trademark dilution under the Lanham Act (15 U.S.C. 1125(c)), (6)
 3 common law trespass to chattels, (7) common law conversion, and (8) unjust enrichment.
 4 Microsoft seeks injunctive and other equitable relief and damages against Defendants for their
 5 creation and ongoing use of the “Rustock” Botnet, which has caused and continues to cause
 6 irreparable injury to Microsoft, its customers and the public.

7 **PARTIES**

8 2. Plaintiff Microsoft is a corporation duly organized and existing under the laws of
 9 the State of Washington, having its headquarters and principal place of business in Redmond,
 10 Washington.

11 3. The Defendants control server software operating from and through the
 12 Command and Control IP Addresses/Domains set forth at Appendices A and B, which is used
 13 to cause harm to Microsoft, its customers and the public.

14 4. Microsoft is unaware of the true names and capacities of the Defendants sued
 15 herein as John Does 1-11, inclusive, and therefore sues these Defendants by such fictitious
 16 names. Defendants own, operate and control the Rustock Botnet from and through the
 17 Command and Control IP Addresses/Domains set forth at Appendices A and B.

18 5. Microsoft will amend this complaint to allege the Defendants’ true names and
 19 capacities when ascertained. Microsoft will exercise due diligence to determine Defendants’
 20 true names, capacities and contact information, and to effect service upon those Defendants.

21 6. Microsoft is informed and believes and therefore alleges that each of the
 22 fictitiously named Defendants is responsible in some manner for the occurrences herein alleged,
 23 and that Microsoft’s injuries as herein alleged were proximately caused by such Defendants.

24 7. The servers located at or hosting the Command and Control IP
 25 Addresses/Domains are maintained by the companies set forth at Appendices A and B to this
 26 Complaint.

27 8. The actions and omissions alleged herein to have been undertaken by the
 28 Defendants were undertaken by each Defendant individually, were actions and omissions that
 COMPLAINT

1 each Defendant authorized, controlled, directed, or had the ability to authorize, control or direct,
2 and/or were actions and omissions each Defendant assisted, participated in, or otherwise
3 encouraged, and are actions for which each Defendant is liable. Each Defendant aided and
4 abetted the actions of the Defendants set forth below, in that each Defendant had knowledge of
5 those actions and omissions, provided assistance and benefited from those actions and
6 omissions, in whole or in part. Each of the Defendants was the agent of each of the remaining
7 Defendants, and in doing the things hereinafter alleged, was acting within the course and scope
8 of such agency and with the permission and consent of other Defendants.

JURISDICTION AND VENUE

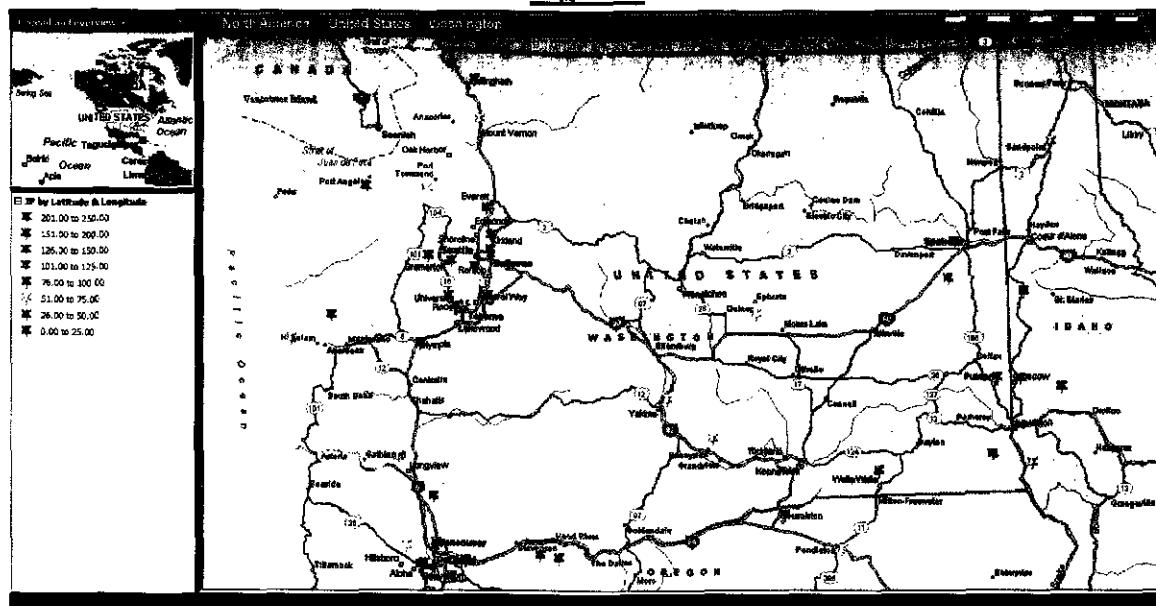
10 9. This action arises out of Defendants' violation of the Federal Computer Fraud
11 and Abuse Act (18 U.S.C. § 1030), CAN-SPAM Act (15 U.S.C. § 7704) and the Lanham Act
12 (15 U.S.C. §§ 1114, 1125(a), (c)). Therefore, the Court has subject matter jurisdiction over this
13 action based on 28 U.S.C. § 1331. This is also an action for trespass to chattels, unjust
14 enrichment and conversion. Accordingly, this Court has subject matter jurisdiction under 28
15 U.S.C. § 1367.

16 10. Defendants have directed acts complained of herein toward Washington, have
17 utilized instrumentalities located in Washington to carry out the acts alleged in this Complaint,
18 and engage in other conduct availing themselves of the privilege of conducting business in
19 Washington. In particular, Defendants have used server software operating from and through
20 the Command and Control IP Addresses/Domains to control a network of compromised user
21 computers, called a “botnet,” which is used by Defendants to conduct illegal activities, thereby
22 causing harm to Microsoft as well as Microsoft’s customers and other members of the public in
23 Washington.

24 11. Defendants have directed actions at Washington, including specifically the
25 Western District of Washington, by directing malicious computer code at the computers of
26 individual users located in Washington and the Western District of Washington specifically,
27 infecting those user computers with the malicious code and thereby making the user computers
28 part of the “botnet,” which is used to injure Microsoft, its customers and the public. Figure 1

1 depicts the geographical location of user computers in Washington to which Defendants are
 2 known to have directed malicious code, causing them to become infected and part of the botnet:

3 **Figure 1**



12. Defendants have undertaken the foregoing acts with knowledge that such acts
 13 would cause harm through user computers located in Washington, thereby injuring Microsoft,
 14 its customers and others in Washington and elsewhere in the United States. Therefore, this
 15 Court has personal jurisdiction over Defendants.

16. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this judicial district. A
 17 substantial part of the events or omissions giving rise to Microsoft's claims, together with a
 18 substantial part of the property that is the subject of Microsoft's claims, are situated in this
 19 judicial district. Venue is proper in this judicial district under 28 U.S.C. § 1391(c) because the
 20 Defendants are subject to personal jurisdiction in this judicial district.

FACTUAL BACKGROUND

A. Rustock's Architecture Provides A Platform For World-Wide Illegal Activity

1. Overview of Rustock Architecture

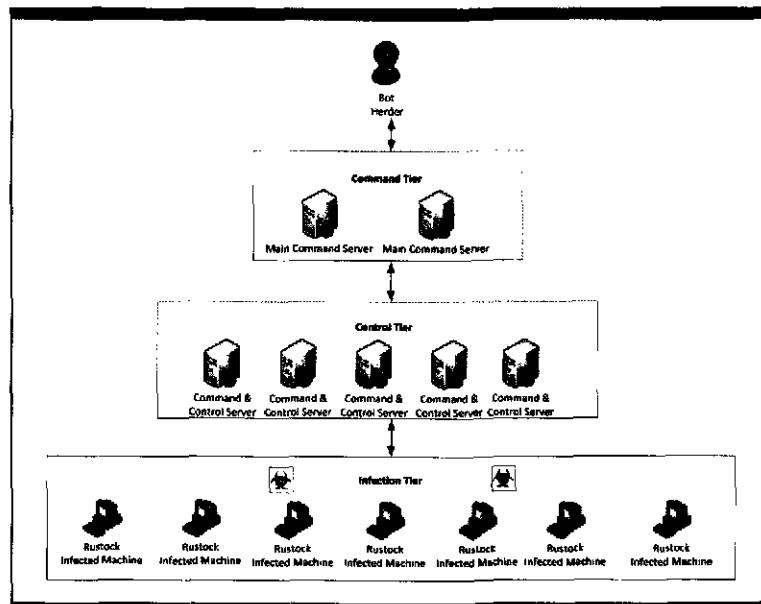
14. Botnets are networks made up of tens of thousands and sometimes, as is the case
 15 with Rustock, over one million infected end-user computers around the world. Malicious actors
 16 often use botnets because of their ability to support a wide range of illegal conduct, their resilience
 17

1 against attempts to disable them, and their ability to conceal the identities of the malefactors
2 controlling them. They provide a very efficient general means of controlling huge numbers of
3 computers and targeting any action internally against the contents of those computers or externally
4 against any computer on the Internet.

5 15. Rustock is a “botnet” and is made up of end-user computers that have been
6 infected, via the Internet, with malicious software (“malware”) that places them under the control
7 of Defendants, who use the infected end-user computers for a variety of illegal activities. Rustock
8 significantly harms Microsoft, its customers, and the public, and if allowed to continue operating,
9 will only increase the damage it inflicts.

10 16. Rustock has a multi-tier architecture. The lowest tier, the "Infection Tier," consists
11 of approximately one million Rustock-infected end-user computers. The Infection Tier performs
12 Rustock's daily illegal activities, such as sending out enormous volumes of spam e-mail. The
13 middle tier in Rustock's architecture, the "Control Tier," consists of specialized Command and
14 Control Servers that relay commands and information to the Rustock-infected end-user computers
15 in the Infection Tier. On information and belief, the top tier in Rustock's architecture, the
16 "Command Tier," which is effectively obscured behind the Control Tier, is made up of the
17 computers that Defendants use to control and direct the Command and Control Servers. This
18 hierarchical architecture is depicted in Figure 2.

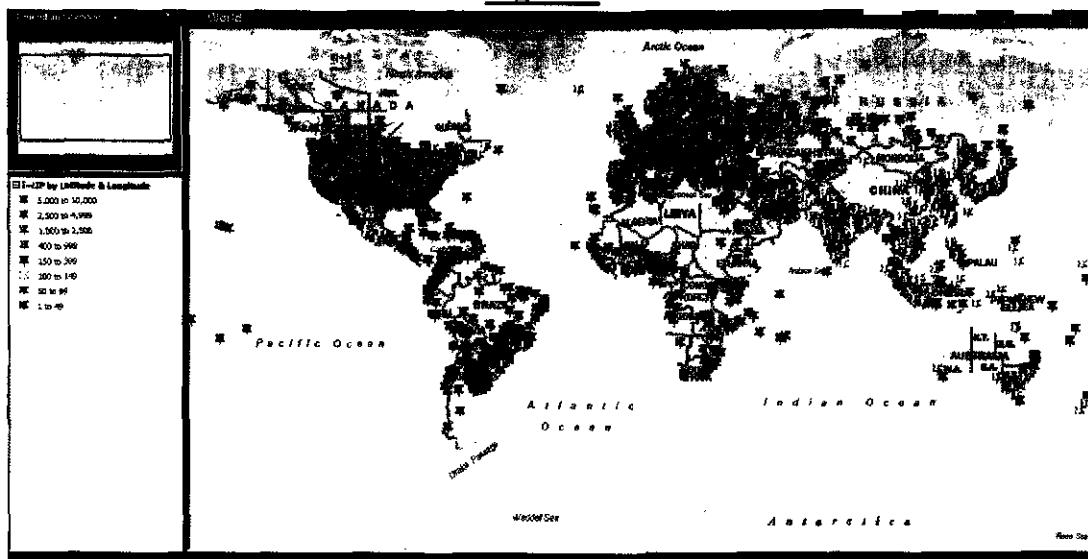
Figure 2



2. The Infection Tier

17. The Infection Tier in the Rustock architecture is made up of a large number of Rustock-infected end-user computers of the type commonly found in businesses, living rooms, schools, libraries, and Internet cafes around the world. For example, between January 22, 2011 and February 4, 2011, Microsoft detected that Rustock-infected end-user computers connected to the Internet from over 1,300,000 unique IP addresses around the world. The locations of these addresses world-wide are shown in Figure 3.

Figure 3



18. Analysis by Microsoft and independent researchers indicates that Rustock uses

1 several methods to infect end-user computers. One method involves using malware known as a
 2 “Trojan downloader” that infects the end-user computer with Rustock malware, often along with
 3 other types of malware that, upon information and belief, are used to steal the user’s confidential
 4 information and/or enlist his or her computer in other illegal conduct. In general, Defendants are
 5 constantly engaged in infecting additional end-user computers with Rustock malware. To counter
 6 them, numerous software providers and software security firms are constantly engaged in trying to
 7 disinfect those computers. However, this is a complex task: owners of infected computers would
 8 need to undertake a specific investigation to even become aware of the infection, something many
 9 consumers are unable to undertake independently.

10 19. Reliable analyses estimate that there are *upwards of one million* Rustock-infected
 11 end-user computers in the world. Defendants direct these Rustock-infected end-user computers to
 12 generate and send out a staggering volume of unsolicited bulk e-mail, commonly known as
 13 “spam.” For example, in one 45 minute period on January 25, 2010, Microsoft’s investigative
 14 team directly observed a single Rustock-infected end-user computer generate approximately 7,500
 15 spam messages. At various times in 2010, Rustock was credited with generating between 20%
 16 and 60% of all spam on the Internet. Recent data shows that Rustock’s capacity to send out
 17 massive volumes of spam remains strong.

18 20. The vast majority of Rustock-generated spam e-mails promote counterfeit or
 19 unapproved generic pharmaceuticals from unlicensed and unregulated on-line drug-sellers. A
 20 large number of Rustock’ spam e-mails use the trademarks of a well-known pharmaceutical
 21 manufacturer, Pfizer, Inc. to promote counterfeit pharmaceuticals. Still other Rustock spam e-
 22 mail used *both* Pfizer’s and Microsoft’s trademarks to promote these pharmaceuticals. Other
 23 Rustock spam samples used Microsoft’s “Microsoft,” “Hotmail,” and “Windows” trademarks (the
 24 “Microsoft Marks”) to lure recipients into a confidence scam known as “advance fee fraud,” in
 25 which spammers attempt to convince recipients that they’ve won a lottery and that they need to
 26 send the spammers some amount of money to collect the larger lottery winnings. On information
 27 and belief, most, if not all, owners of Rustock-infected end-user computers are unaware that their
 28 computers are infected and operating as part of the Rustock botnet, or that their computers are

1 sending out spam messages.

2 **3. The Defendants Command The Rustock-Infected End-User Computers**
 3 **Through the Control Tier**

4 21. The second level of the botnet, the Control Tier, is comprised of Command and
 5 Control Servers¹ that, upon information and belief, Defendants have purchased or leased and
 6 which they use to relay commands to control the Rustock-infected end-user computers of the
 7 Infection Tier. There are presently approximately 96 Rustock Command and Control Servers
 8 operating on the Internet. The number and locations of the Command and Control Servers may
 9 change over time, and Microsoft and other security-researchers monitor Rustock to detect these
 10 changes.

11 22. The Rustock Command and Control Servers send Rustock-infected end-user
 12 computers information and instructions over the Internet that force the Rustock-infected end-user
 13 computers to send out spam messages without the knowledge, approval, or involvement of the
 14 end-users. On information and belief, the spam sent out by Rustock-infected end-user computers
 15 is based on “spam-templates” or resource files that the end-user computers receive from the
 16 Rustock Command and Control Servers.² On information and belief, spam templates or resource
 17 files containing Microsoft trademarks are stored on the Rustock Command and Control Servers.
 18 The Rustock-infected end-user computers use these templates and resource files to generate the
 19 spam that they send out.

20 23. The Rustock Command and Control Servers listed in Appendix A are located at IP
 21 addresses that are associated with computers physically located at data centers or web hosting
 22 companies³ operated by third-parties in the United States. Defendants have either purchased or

23 ¹ The term “Command and Control Servers” refers either to physical server computers in the Command Tier
 24 completely dedicated to supporting Rustock, or may be Rustock server software running on computers that might
 25 also be running software that is not connected to Rustock.

26 ² The term “spam-template” refers to a file that contains what amounts to a pre-written spam message with certain
 27 information such as the “To” address and the date represented by variables (essentially, placeholders) that can be
 28 replaced with actual information before sending. The term “resource file” refers to a type of file commonly used in
 software applications that stores strings of text, images, or other information in a way that can be accessed and used
 by other software programs.

29 ³ The term “hosting company” refers to a type of company that specializes in offering computer hardware, software,
 30 connection to the Internet, technical support, and other services to companies or individuals seeking to have a website
 31 or some other presence on the Internet.

1 leased these computers, or purchased a subscription plan that allows them to run Rustock
 2 command and control software on these computers.

3 **B. RUSTOCK DIRECTLY INJURES MICROSOFT'S CUSTOMERS**

4 **1. Overview of Harm To Microsoft And Its Customers**

5 24. Microsoft is a provider of the Windows operating system, Hotmail e-mail services
 6 and a variety of other software and services. Microsoft has invested substantial resources in
 7 developing high-quality products and services. Due to the high quality and effectiveness of
 8 Microsoft's products and services and the expenditure of significant resources by Microsoft to
 9 market those products and services, Microsoft has generated substantial goodwill with its
 10 customers, has established a strong brand, has developed the Microsoft name and the names of its
 11 products and services into strong and famous world-wide symbols that are well-recognized within
 12 its channels of trade. Microsoft has registered trademarks representing the quality of its products
 13 and services and its brand, including the Microsoft Marks.

14 25. The activities carried out by the Rustock botnet, described in detail above, and the
 15 numerous resulting injuries to the public at large and Microsoft's customers, injure Microsoft and
 16 its reputation, brand and goodwill because users subject to the negative effects of the Rustock
 17 botnet may incorrectly believe that Microsoft is the source of computer problems caused by the
 18 botnet. Microsoft is similarly injured because the botnet directs a large amount of spam e-mail to
 19 users of Microsoft's e-mail services. Microsoft and its customers must bear this heavy burden and
 20 customers may incorrectly believe that Microsoft is to blame for the spam e-mail.

21 **2. Rustock's Unauthorized Intrusion Into Microsoft's Customers'**
 22 **Computers**

23 26. The most direct injury to Microsoft's customers is the installation of the Rustock
 24 malware on their computers without their authorization or knowledge. Rustock malware is
 25 specifically designed to infect and run on computers equipped with the Windows operating
 26 system, which is licensed by Microsoft to end-users. End users' computers can become infected
 27 with Rustock malware through a variety of mechanisms, some of the most common of which are
 28 visiting an infected website where a Trojan downloader designed to download Rustock is staged,

1 or opening an infected attachment to an e-mail.

2 27. The installation of Rustock malware in and of itself damages the user's computer
 3 and the Windows operating system on the user's computer. During the infection of an end-user's
 4 computer, Rustock malware makes changes at the deepest and most sensitive levels of the
 5 computer's operating system including the kernel, registry, and systems files. It installs its own
 6 kernel mode-driver and intercepts and processes various Windows driver-requests. It alters the
 7 behavior of various Windows operating system routines by manipulating various registry key
 8 settings. It replaces Windows files with files of the same name that contain the Rustock malware.
 9 It installs software that it needs to generate spam and to communicate with the Rustock Command
 10 and Control Servers. Microsoft's customers whose computers are infected with Rustock malware
 11 are damaged by these changes to Windows, which alter the normal and approved settings and
 12 functions of the user's operating system, and destabilize it, and which result in the customers'
 13 computers being forcibly drafted into the botnet.

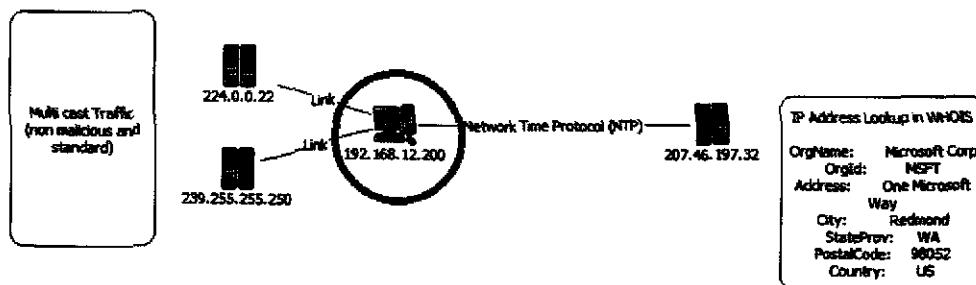
14 28. Customers are usually unaware of the fact that their computers are infected and
 15 have become part of the Rustock botnet. Even if aware of the infection, they lack the technical
 16 resources or skills to solve the problem, allowing their computers to be misused indefinitely.
 17 Even with professional assistance, cleaning a Rustock-infected end-user computer can be
 18 exceedingly difficult, time-consuming, and frustrating.

19 **3. Microsoft Customers' Computers Are Used in Criminal Activity**

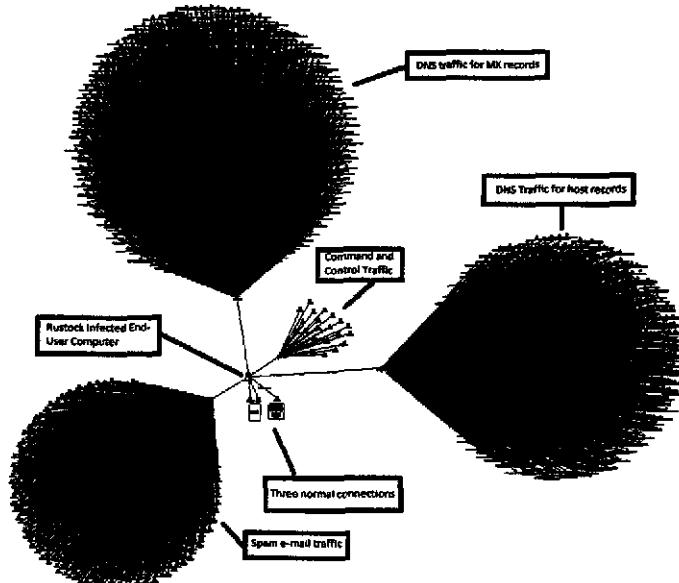
20 29. Once infected with Rustock malware, the end-user's computer is under the control
 21 of the Rustock bot-herder and used by the Defendants for illegal activities. The primary function
 22 of a Rustock-infected end-user computer is to send out a very large quantity of illegal spam e-mail
 23 each day of its operation. Furthermore, the spam e-mails sent out by Rustock-infected end-user
 24 computers illegally infringe the trademarks of Microsoft and other companies. Rustock spam
 25 promotes pharmaceutical products that have been shown to be counterfeit, unlicensed, and
 26 potentially dangerous to purchasers. Customers are harmed by having their computers impressed
 27 into these illegal, harmful, and potentially criminal activities.

1 **4. Microsoft's Customers' Computer-Resources Are Utilized for Illicit**
2 **Purposes**

3 30. A Rustock-infected end-user computer's processing power, memory,
4 communications bandwidth, and other resources are used for the high volume of processing, data
5 transfer and connections to the Internet that the Rustock-infected end-user computer engages in.
6 For example, Figure 4 shows the tiny handful of Internet connections made by an uninfected
7 Windows computer (circled) over the course of almost six hours.

Figure 4

31. In contrast, Figure 5 shows the enormous number of Internet connections made in a mere 24 minutes by a Rustock-infected end-user computer. The Rustock-infected end-user computer made the three normal connections of the baseline computer, but in addition, it performed 1406 unique lookups for various DNS "A" hosts on the Internet, 2238 unique lookups for DNS "MX" records for mail servers on the Internet, attempted to send spam e-mail to 1376 e-mail servers on the Internet, including to a number of Hotmail and MSN e-mail account customers; and in addition made 22 connections to Command and Control Servers or other servers on the Internet. The computing power and resources devoted to Rustock's nefarious activities are unavailable for the customer's legitimate uses.

Figure 5

1 **5. Microsoft Customers Are Directly Targeted by Rustock's Spam**
 2 **Campaigns**

3 32. Microsoft customers are also targeted by Rustock spam campaigns. For example,
 4 during the four-day period between October 26, 2010 and October 29, 2010, Rustock-infected
 5 end-user computers sent approximately 34 million e-mails to roughly 50 million Hotmail
 6 accounts, resulting in an average of approximately eight million spam e-mails per day, providing a
 7 good approximation of the total amount of Rustock spam sent to Hotmail customer accounts on
 8 any given day. Approximately 450,000 of these e-mails got through Microsoft's spam filters and
 9 reached Microsoft's Hotmail customers. The very large amount of spam reaching Microsoft's
 10 Hotmail customers frustrates them and diminishes their regard for Hotmail and Microsoft. Aside
 11 from the harm done to Microsoft Hotmail account customers resulting from the sheer volume of
 12 Rustock spam bombarding their Hotmail accounts, Rustock's spam attempts to lure them into
 13 confidence schemes hatched by the spammers or other activities that will lead to further potential
 14 injury, such as purchasing counterfeit or unapproved pharmaceuticals on the Internet.

15 33. Pharmaceutical counterfeiting, heavily promoted by Rustock, is, in essence, a
 16 crime of fraud, trick, and deceit. Counterfeitors deceive patients into believing that the products
 17 they offer are safe and effective medicines from trusted pharmaceutical companies such as Pfizer,
 18 upon whose integrity they have relied to receive medicines that permit them to live happier and
 19 healthier lives. In reality, however, counterfeit pharmaceutical products place human lives at
 20 grave risk. And patients who order pharmaceuticals online in response to spam e-mail promotions
 21 are particularly likely to place their health at risk.

22 **6. Microsoft Pays The Cost Of Protecting Hotmail Account Customers**
 23 **From Rustock Spam**

24 34. Microsoft, as a provider of online e-mail services such as Hotmail, must maintain
 25 spam filters to stop Rustock spam from reaching its customers. Rustock was acknowledged as the
 26 largest known spam botnet in the world at its 2010 peak, with an estimated capacity to send over
 27 40 billion spam e-mails per day, including to users of Microsoft's Hotmail e-mail service. Known
 28 as the "King of Spam" in the Internet security community at that time, Rustock was estimated to
 disseminate approximately 40 percent of the world's spam e-mail. While the volume of spam

1 attributed to Rustock fluctuates over time, recent data shows that Rustock is continuing in 2011 as
 2 major contributor of spam on the Internet. Microsoft Hotmail systems are the target of a
 3 substantial volume of Rustock spam. The sending of vast amounts of spam e-mail to Microsoft's
 4 Hotmail e-mail services imposes a burden on Microsoft's Hotmail systems, and requires
 5 Microsoft to expend substantial resources in an attempt to defend against and mitigate its effects.

6 **7. Microsoft Pays The High Cost of Assisting Customers Whose**
Computers Are Infected By Rustock

7 35. Additionally, Microsoft devotes significant computing and human resources to
 8 combating Rustock infections and helping customers determine whether or not their computers are
 9 infected, and if so, cleaning them. Customers' frustration with having to deal with Rustock
 10 infections on their computers diminishes their regard for Windows and Microsoft, and tarnishes
 11 Microsoft's reputation and goodwill.

12 **FIRST CLAIM FOR RELIEF**

13 **Violation of the Computer Fraud & Abuse Act, 18 U.S.C. § 1030**

14 36. Microsoft realleges and incorporates by reference the allegations contained in
 15 paragraphs 1 through 35 above.

16 37. Defendants: (1) knowingly and intentionally accessed Microsoft customers'
 17 protected computers and Microsoft's protected computers without authorization or in excess of
 18 any authorization knowingly caused the transmission of a program, information, code and
 19 commands, and as a result of such conduct intentionally caused damage without authorization
 20 to the protected computers (18 U.S.C. § 1030(a)(5)(A)); and (2) intentionally accessed the
 21 protected computers without authorization, and as a result of such conduct caused damage and
 22 loss (18 U.S.C. § 1030(a)(5)(C)).

23 38. Defendants' conduct has caused a loss to Microsoft during a one-year period
 24 aggregating at least \$5,000.

25 39. Microsoft has suffered damages resulting from Defendants' conduct.

26 40. Microsoft seeks compensatory and punitive damages under 18 U.S.C. § 1030(g)
 27 in an amount to be proven at trial.

41. As a direct result of Defendants' actions, Microsoft has suffered and continues to suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

SECOND CLAIM FOR RELIEF

Violation of CAN-SPAM Act, 15 U.S.C. § 7704

42. Microsoft realleges and incorporates by reference the allegations contained in paragraphs 1 through 35 above.

43. Microsoft is a provider of Internet access service. Microsoft enables users to access content, including proprietary content, electronic mail, and other Internet services.

44. Defendants initiated the transmission of unsolicited, bulk spam e-mail, which are commercial electronic messages, via the Rustock botnet, through Microsoft customers' computers and through Microsoft's computers, which are used in interstate and foreign commerce and communication, to thousands or millions of computers, which are also used in interstate and foreign commerce and communication and are "protected computers" as defined by 18 U.S.C. § 1030(e)(2)(B).

45. By sending messages via the Rustock botnet, Defendants initiated the transmission of commercial electronic mail messages, to protected computers that contained materially false or misleading header information in violation of 15 U.S.C. § 7704(a)(1).

46. Defendants initiated the transmission of commercial electronic messages to protected computers with actual or fairly implied knowledge that the subject headings of the messages would likely materially mislead recipients regarding the contents or subject matter of the message in violation of 15 U.S.C. § 7704(a)(2).

47. Defendants transmitted to protected computers commercial e-mail messages that did not contain a functioning return electronic mail address or other Internet-based mechanism that recipients could use to contact Defendants and indicate their desire to opt-out of future messages from Defendants, in violation of 15 U.S.C. § 7704(a)(3).

48. Defendants initiated the transmission to protected computers of commercial electronic messages that did not provide (a) clear and conspicuous identification that the COMPLAINT 15

1 message was an advertisement or solicitation; (b) clear and conspicuous notice of the right to
 2 decline to receive future message; or (c) a valid physical postal address of the sender, in
 3 violation of 15 U.S.C. § 7704(a)(5).

4 49. Defendants' unsolicited, bulk e-mails were sent as part of a systematic pattern
 5 and practice that did not conspicuously display a return electronic mail address by which the
 6 recipients could submit to the true sender a reply requesting that no further commercial e-mails
 7 be sent to the recipient.

8 50. As a direct result of Defendants' actions, Microsoft has suffered harm in an
 9 amount to be determined at trial.

10 51. Microsoft is entitled to the greater of actual damages or statutory damages in
 11 accordance with 15 U.S.C. § 7706(g)(1)(B).

12 52. On information and belief, Defendants' actions were willful and knowing,
 13 entitling Microsoft to aggravated damages in accordance with 15 U.S.C. § 7706(g)(3)(C).

14 53. As a direct result of Defendants' actions, Microsoft has suffered and continues to
 15 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
 16 continue unless Defendants' actions are enjoined.

THIRD CLAIM FOR RELIEF

Trademark Infringement Under the Lanham Act – 15 U.S.C. § 1114 *et. seq.*

19 54. Microsoft realleges and incorporates by this reference each and every allegation
 20 set forth in paragraphs 1 through 35 above.

21 55. Defendants have used the Microsoft Marks in interstate commerce.

22 56. The Rustock botnet uses counterfeit copies of the Microsoft Marks in spam e-
 23 mail, including through the software operating from and through the Command and Control
 24 Servers. By doing so, Defendants are likely to cause confusion, mistake, or deception as to the
 25 origin, sponsorship, or approval of the spam e-mail and material promoted through the spam e-
 26 mail.

27 57. By using the Microsoft Marks falsely in connection with spam e-mail,
 28 Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or
 COMPLAINT

1 approval of the e-mail sent by the Rustock Botnet.

2 58. As a result of their wrongful conduct, Defendants are liable to Microsoft for
 3 violation of this provision of the Lanham Act.

4 59. As a direct result of Defendants' actions, Microsoft has suffered and continues to
 5 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
 6 continue unless Defendants' actions are enjoined.

7 60. Defendants' wrongful and unauthorized use of the Microsoft Marks to promote,
 8 market, or sell products and services constitutes trademark infringement pursuant to 15 U.S.C. §
 9 1114 *et seq.*

FOURTH CLAIM FOR RELIEF

False Designation of Origin Under The Lanham Act – 15 U.S.C. § 1125(a)

12 61. Microsoft realleges and incorporates by this reference each and every allegation
 13 set forth in paragraphs 1 through 35 above.

14 62. The Microsoft Marks are distinctive marks that are associated with Microsoft
 15 and exclusively identify Microsoft's business, products, and services.

16 63. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing
 17 so, Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship,
 18 or approval of the conduct, actions, products and services carried out by or promoted by
 19 Defendants and the Rustock Botnet, including software operating from and through the
 20 Command and Control Servers.

21 64. As a result of their wrongful conduct, Defendants are liable to Microsoft for
 22 violation of this provision of the Lanham Act.

23 65. As a direct result of Defendants' actions, Microsoft has suffered and continues to
 24 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
 25 continue unless Defendants' actions are enjoined.

FIFTH CLAIM FOR RELIEF

Trademark Dilution Under The Lanham Act – 15 U.S.C. § 1125(c)

28 66. Microsoft realleges and incorporates by this reference each and every allegation
 COMPLAINT

1 set forth in paragraphs 1 through 35 above.

2 67. The Microsoft Marks are distinctive marks that are associated with Microsoft
 3 and exclusively identify Microsoft's business, products, and services.

4 68. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing
 5 so, Defendants are likely to cause dilution by blurring and dilution by tarnishment of the
 6 Microsoft Marks.

7 69. As a direct result of Defendants' actions, Microsoft has suffered and continues to
 8 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
 9 continue unless Defendants' actions are enjoined.

SIXTH CLAIM FOR RELIEF

Common Law Trespass to Chattels

12 70. Microsoft realleges and incorporates by this reference each and every allegation
 13 set forth in paragraphs 1 through 35 above.

14 71. Defendants' actions in operating the Rustock Botnet result in unauthorized
 15 access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic
 16 mail being sent to, from or through the computers of Microsoft and its customers.

17 72. Defendants intentionally caused this conduct and this conduct was unauthorized.

18 73. Defendants' actions have caused injury to Microsoft and its customers and
 19 imposed costs on Microsoft and its customers, including time, money and a burden on the
 20 computers of Microsoft and its customers, as well as injury to Microsoft's business goodwill
 21 and diminished the value of Microsoft's possessory interest in its computers and software.

22 74. As a result of Defendants' unauthorized and intentional conduct, Microsoft has
 23 been damaged in an amount to be proven at trial.

24 75. As a direct result of Defendants' actions, Microsoft has suffered and continues to
 25 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
 26 continue unless Defendants' actions are enjoined.

1
2 **SEVENTH CLAIM FOR RELIEF**

3 **Conversion**

4 76. Microsoft realleges and incorporates by this reference each and every allegation
5 set forth in paragraphs 1 through 35 above.

6 77. Defendants have willfully interfered with and converted Microsoft's personal
7 property, without lawful justification, as a result of which Microsoft has been deprived of
8 possession and use of its property.

9 78. As a result of Defendants' actions, Microsoft has been damaged in an amount to
10 be proven at trial.

11 79. As a direct result of Defendants' actions, Microsoft has suffered and continues to
12 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
13 continue unless Defendants' actions are enjoined.

14 **EIGHTH CLAIM FOR RELIEF**

15 **Unjust Enrichment**

16 80. Microsoft realleges and incorporates by this reference each and every allegation
17 set forth in paragraphs 1 through 35 above.

18 81. The acts of Defendants complained of herein constitute unjust enrichment of the
19 Defendants at Microsoft's expense in violation of the common law.

20 82. Defendants accessed, without authorization, computers running Microsoft's
21 software or computers which otherwise belong to Microsoft.

22 83. Defendants used, without authorization or license, the facilities of Microsoft's
23 software and computers which belong to Microsoft to, among other acts, deliver malicious
24 software, support the Rustock Botnet, infringe Microsoft's trademarks, deliver unsolicited, bulk
25 e-mail and deceive users.

26 84. Defendants' actions in operating the Rustock Botnet result in unauthorized
27 access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic
28 mail being sent to, from or through the computers of Microsoft and its customers.

85. Defendants profited unjustly from their unauthorized and unlicensed use of Microsoft's software and the computers of Microsoft and its customers.

86. Defendants had an appreciation and knowledge of the benefit they derived from their unauthorized and unlicensed use of Microsoft's software and the computers of Microsoft and its customers.

87. Retention by the Defendants of the profits they derived from their unauthorized and unlicensed use of Microsoft's software and the computers of Microsoft and its customers would be inequitable.

88. Defendants' unauthorized and unlicensed use of Microsoft's software and use of the computers of Microsoft and its customers have damaged Microsoft in an amount to be proven at trial, and Defendants should disgorge their ill-gotten profits.

89. As a direct result of Defendants' actions, Microsoft has suffered and continues to suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Microsoft prays that the Court:

1. Enter judgment in favor of Microsoft and against the Defendants.
2. Declare that Defendants conduct has been willful and that Defendants have acted with fraud, malice and oppression.
3. Enter a preliminary and permanent injunction enjoining Defendants and their officers, directors, principals, agents, servants, employees, successors, and assigns, and all persons and entities in active concert or participation with them, from engaging in any of the activity complained of herein or from causing any of the injury complained of herein and from assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activity complained of herein or from causing any of the injury complained of herein.

4. Enter a preliminary and permanent injunction isolating and securing the botnet infrastructure, including the software operating from and through the Command and Control IP Addresses/Domains and placing that infrastructure outside of the control of Defendants or their

1 representatives or agents.

2 5. Enter judgment awarding Microsoft actual damages from Defendants adequate to
3 compensate Microsoft for Defendants' activity complained of herein and for any injury
4 complained of herein, including but not limited to interest and costs, in an amount to be proven
5 at trial.

6 6. Enter judgment disgorging Defendants' profits.

7 7. Enter judgment awarding enhanced, exemplary and special damages, in an
8 amount to be proved at trial.

9 8. Enter judgment awarding attorneys' fees and costs, and

10 9. Order such other relief that the Court deems just and reasonable.

12 Dated: February 8, 2011.

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14 By:

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Telephone: +1-206-839-4300

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24 Menlo Park, CA 94025

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Facsimile: +1-650-614-7401

26 Attorneys for Plaintiff Microsoft Corp.

DEMAND FOR JURY TRIAL

Microsoft respectfully requests a trial by jury on all issues so triable in accordance with Fed. R. Civ. P. 38.

Dated: February 8, 2011.

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Attorneys for Plaintiff Microsoft Corp.

COMPLAINT

Appendix A

IP Addresses Of Command And Control Servers	Location Of The Data Centers Hosting Companies Where Defendants Have Placed The Command And Control Servers
204.45.118.202	FDCservers.net, LLC
204.45.118.250	141 W. Jackson Blvd., Suite 1135 Chicago, IL 60604
204.45.119.2	And/or
204.45.119.10	1500 Champa St. Denver, CO 80202
204.45.119.18	And/or
204.45.119.26	And/or
204.45.119.34	15204 Kishwaukee Valley Rd. Woodstock, IL 60098
204.45.119.42	
204.45.119.50	
204.45.119.74	
204.45.119.82	
204.45.119.90	
204.45.121.18	
204.45.121.34	
204.45.121.42	
204.45.121.50	
204.45.121.58	
204.45.121.130	
69.197.144.138	Wholesale Internet Datacenter LLC Wholesale Internet, Inc.
69.197.158.250	
69.197.161.34	
173.208.143.194	324 E. 11th St.
173.208.154.90	Suite 1000
204.12.192.250	Kansas City, MO 64106
204.12.217.42	And/or
204.12.217.250	
204.12.237.202	
204.12.243.34	1102 Grand Blvd, Suite 905
204.12.243.42	Kansas City, MO 64106
204.12.243.58	
204.12.248.66	
208.110.82.186	
204.12.217.218	
69.197.158.242	
173.208.131.178	
173.208.141.154	
173.208.143.90	
173.208.163.242	
173.208.163.178	
204.12.217.218	
204.12.217.98	
173.208.128.50	
173.208.143.114	

204.12.220.122 208.110.71.58	
64.120.144.69 64.120.149.117 64.120.153.117 64.191.38.165 64.191.53.37 64.191.59.245 66.96.224.213 66.197.161.181 66.197.251.69 96.9.180.21 96.9.182.101 96.9.182.197 96.9.183.149 66.96.214.53 173.212.243.114 64.191.18.149 173.212.214.194 173.212.241.42 173.212.241.50	BurstNET Technologies, Inc. d/b/a Network Operations Center, Inc. 420-422 Prescott Ave Scranton, PA 18510
96.0.203.82 96.0.203.90 96.0.203.98 96.0.203.106 96.0.203.114 96.0.203.122 173.83.26.26 173.83.26.34 96.9.169.53	Ecommerce, Inc. 1774 Dividend Dr Columbus, OH 43228
74.86.210.134 208.43.17.44 208.43.18.12 208.43.40.148 208.101.27.108 208.101.27.72 74.86.210.133 173.192.135.98 173.192.135.99 208.43.157.96 173.192.135.102 67.228.206.92 174.36.237.84 208.43.102.220	Softlayer Technologies c/o Infomart Data Center Facility 1950 North Stemmons Freeway Dallas, TX 75207-3118 and 4030 Lafayette Center Dr. Chantilly, VA 20151 and

	c/o Sabey carrier hotel 3355 S. 120th Place Tukwila, WA 98168
98.126.42.26	<p>VPLS Inc. d/b/a Krypt Technologies</p> <p>1400 South Grand Ave Santa Ana, CA 92705</p> <p>And/or</p> <p>One Wilshire 624 South Grand Ave Los Angeles, CA 90017</p> <p>And/or</p> <p>600 West 7th Street, Suite 530 Los Angeles, CA 90017</p> <p>And/or</p> <p>800 South Hope Los Angeles, CA 90017</p>
66.79.162.86 66.79.163.102 66.79.162.138	<p>DCS Pacific Star, LLC</p> <p>5050 El Camino Real, Suite 238 and/or 268 Los Altos, CA 94022</p>
69.50.197.191	<p>Atjeu Publishing LLC / Atjeu Hosting LLC</p> <p>1515 West Deer Valley Road Bldg C-103 Phoenix, AZ 85027</p>
98.141.220.194 98.141.220.226 76.161.33.58	<p>Reliable Hosting Services, LLP</p> <p>11513-19 Sunset Hills Road Reston, VA 20190</p>
96.31.81.44	<p>Noc4Hosts Inc.</p> <p>4465 W. Gandy Blvd Suite 812 Tampa FL 33611</p>

Appendix B

Domains and Registries

- **Registries:**

Verisign Naming Services
21345 Ridgetop Circle
4th Floor
Dulles, VA 20166

Afilias USA, Inc.
Building 3, Suite 105
300 Welsh Road
Horsham, PA 19044

- **Domains:**

gbsup.com	07fhvk3feedeedwjr.me	mtibygfof5do.info
djl004daiwyed62wd.me	lgmhw46cbtfi46fuo.net	fcibyx3fkor62rvm.info
osg00aqslnpspyo.info	93mhx1cvtbatijbx.name	fmfc1cvmlqaa93gb.name
pan00c4sshilwgi.info	thuhxspadoa1.info	olnc41cjbkndoyu69k.info
ovn00elprb15b6bodr.name	r93hxwopfotn.me	ienc4abwr3fpc.name
db600rgsajryc.com	kdbhyqfyuwquf.info	kelc4dupiijc.name
pre015koynvhkiqja1.name	bsqj15fd2tihom69kt.net	4dnc4fdqnyijxfkmb.name
pf703fiuipluauo.com	qgni31wl77xwynoys.net	rbbc4jkvsfqoo.net
rj7069ht31wdxettj.info	axoi69jifoygsob8c.info	wkpc4lreomnil.info
cme070vafafcsrh.info	gvai69wwujsdobn.name	v9ac4mkttuxfic4.name
ipj07fyuft62nxlh.name	5bei70leuqchbm.name	lvcc4xuusxrhgc.name
fqw07sow85ofbe0.com	edaiacf46lbua.com	ihac4yrfhcygb6xgr.name
aws07tb6sl38vv.me	yhtiafiaytxybgm.net	vsfc54dfubmfcbo.net
bap07yd2syjafp.name	hkriahfrtbm31vba.name	ssxc54rw3f38lohf70.info
ldv07yiqrlsju.com	85sialfsscbbdkrm.info	yqdc62mkyww4dke.info
oee0a2atcb31tsrp07n.net	dkxibhuabm0eho.me	2avc69oxr54kew15mt.net
qq70aixymnkxwclq.info	elkicmthxpmswcf.me	ykbc85rpntilie7.me
voe0amt62ttheg.net	dvbid2o77wglhv.net	00kc8cjqbfcasd24dg.me
afe0avd85efvdjy.name	tsmidhbykgk231cu.name	ckmc1scbf31c.name
rl00b6e0rehet7762p70xr.net	djiwidw31jhukcbs.me	wk8cabpuoxcwem.com
ts70brftisf.name	rhcidye0c4drq.com	fx8cacacuajpaji.net
bv00cfxmgpir4dij.me	uljiebve4dcmtyb.name	lb6cafwwsyeqb6gbp.com
irn0e5btrnv70oo.com	j23ieiaca1ala862h.info	jiqcatejfwrq.me
he00e7sk62ycdhexbu.net	h8ciej4693cmhuqff5.name	hwtcawn15mksmjo.info
i850eaqdpoctbj77afc.net	iniieldgteui.info	hnmcaxosesqgogg.me
rff0edb7dyjbeyl.name	cliffduantlcjho.com	oescb31ot46oer.me
xwb0eikesriess54.name	vgiifnd1cseedqrx.me	5boccb646xyhqcl.info
pwr0enkgc4ub54sn.net	85bifoeekdyjy.com	85xcb7ekttb691cx.net
70c0epgigtgvy00xi.me	rxgifurhf69sihy07.name	2axcb93aminifnaf.me
31v0epoqpqwadnea1.com	vicigfvwwxyq.info	3frcbafwb6dctvqgv.com

xim0eqvksjmp.net	69oigxk85ruyqynq.info	cjgcbbdafeijgahidx.com
bti0ermli07gb6mc4c.net	liyihejbmsbm70.com	uaqcbhhxrypo.name
tgs0esgnaelnjm38.info	ubxiyhnedjmlx0e.info	t15cbdcbouhfjxxdv.info
et70fhpbilb.net	e70ihypdjhb6jy.name	cqocbdtdw2wi3f3f.info
hj00fwpqbxgepn.name	afgii62uvahi.info	sedcbduxquiqdh.com
rs00gfk8cejau.info	15diic4ufee700j.me	jclcbepond2f.info
jpe0gm9ai00ifwdgsp.net	mxbiilxisdfjc62s.com	mn8cbfbda1f5omwiv.com
uec0iojpfbvuqpfbd.com	nuxikfcu5b9aerya1.me	pxdcbhnpuiugre.name
lj70klepssba.name	ra8ikt70ajslesi.info	dmccbrmvs85sjxxov.com
ri00kqte7ymld4dd.com	xmnim85lesswp.info	jlhcbpqeejcvfq.me
jk70lifnetb1cd9h.com	odynimgowlbwyyj.me	egmcbpupdebcdgi.net
lxe0lleeyd9bmjogt.info	aqrinxiskte23.me	xawcbqa1ffpykv.name
twe0lplhbtsh.com	l93iooo23mahd2afqot.com	f5fcbqm8cejmen.info
kre0nlxsnfca8lxmbi.net	fd9ioxknxxtypi.h.name	iwvcbrmnf31algcc.net
nve0rspgf5buvur38t.name	wbdipafhxddmdd2.me	fitcbrpp62xpkulb.net
dc00tvorseveq.me	3feipemhpovjghv.com	p5bcbtprmibkhvfc4.me
e000wb6bcinetp5b.com	yofiqlmud07i.com	m9acc46mr15lggeebm.me
bme0wkcb93padne7cs.com	dwimirc4vfcsshc.name	i7ecclerxwnd.net
cde0ype7ve7hl15fug.info	d2eisgxqp1cfc.info	df5ccnq77xsoq.me
uc31318cwvojm.v.name	ebtisicwjcb.name	23cccqqmi62qa.net
nek1515wi31uqbbxkv.com	qwhitekamwkkyy.net	x9accwwnpwqwuhyi.net
lji152aqrfisxro.name	dhnitftxpdnf69acb.com	ec8cd2kriqfpco7th.name
mtm1562dqwgfwyc.info	rehitynrea8pvsm0e.info	mafcd946f70fe7a1u.info
tpm15d3ftvnxipray.me	e7liu461cotctn69.com	vn1cdxckl85ry.net
3fe15e7gwv85yagk.info	gtniuftnkkprqn.me	kefceasagf58csb.net
y7015ifdyndys.info	saoiuio7esujc.info	ssucegsfm1cj.com
cbp15oshnpw62m.com	pxyiuljnct070eou.name	csncejnhpvat.me
fcq15rxcyu015u.com	l85iuvejfeagan93a.me	0efcetqfcvxowb.name
thd15wvrh5bi8c.net	irsiv70bf4dlh.info	0eicfdoa8veoe.me
pfc15x00gxruigm.info	cqsiwkokuervp.net	vi1cfid9aknqn2aa07.info
dwa15xomkykkpfaa.me	euwixdkcb31ut.info	dlvcg93gpi08c62.name
xt319acc770erpwmbe.me	abpxe2aaa1ccih.com	snxcmoqwbici.info
2aa1a1fafmlxbhbgc.name	vktixfrwwbpbh.com	pnech8507kqlalw.com
wfl1cdicvmswbbb.net	mcdixokemmjl15.info	b6dchspuf77bnbbde.info
cb61cgpdhw1cjtij.info	m2aixsglewyif5.info	xnjcibxhxeesdn.com
uim1cgqohsd9lwlap.name	cjdiyf5wnerq.info	qe7cietqjha1mtx.me
pfa1d9mqnvoqj.com	lkniyue15cwj.net	mbociosskowfc.net
aya1hdxcl00ax.me	yqvliuihctn.net	awbcivbncyqs.me
tb31jqigvy5bo.name	kkjij00yeckvcgses.net	prvcj15ux1ckxmuf.info
tt31mynwlvkwlwgn.net	rkyj6907j3800d2rma.com	0eecjavbrkynx9aw.info
eb31ppvwqwoa8af.info	qulij69rlrlbjxjjb.me	bj1cjwb6vljt93j.name
gma1qceordc15.me	a1cja0elcwrpgsxs.name	deucke7urpckf62ik.me
tva1re85jfa138shgb.com	v38jafaqbgrt5b.me	qldckerja1area1d.net
kd31sh8c7eljd9cbmwa.me	jgajafdkwplqc.net	b7eckrmvsd9djot.info
rc31umxssden.net	70tjamx5bsuvrb31m.name	cbqcknde7bdudl3fkfx.com
pr31x9a0ejxyybju.com	qppjanb6djpscrd2e.info	23qclkhocyg8cxas.me
vd31x1544dfddnmfmm.me	nvijb6umafimksj.name	dfgclma93rvcbdxl.name
ioa1xorbtflqrpb.name	uh3jcbdhedunt.com	f5acixwmd9dtu.name
cop23acb69iib.net	lljcpaplc4p.info	h15cmbdcliyowf.net
ibi23bhsseepqi.me	nxjidotv4dhpk.name	ibbcmcbukseesb.com

kdt23gremasxlt.net	n8cjdqhlcpfcu.info	qvqcmibyac4teee.me
ria23lbsn23tcbg00dn.info	kdajeeddodoxph.name	gl1cmoan4dxbafp93.info
tai23nb6rv15kd.me	xejjehwgc4a1dr93cq.com	nfqcmurubqxq.com
sff23o54xgle7kp.me	i0ejenld2meyunc4fj.me	jmcnbnudrv.info
weu23p00wco00frt.com	ulyjetxmtfwye7.name	jrgcopjummqd9.info
xfm23poewdf5bru.info	tiejf54wjx7ewg.name	gjccqdehwdpxf.me
aym23uuuhc4kd.me	dfjjfbxyxybbbe7f9a.com	dcfcorns93k8cid2dq.name
bdd293iongsrn38ot.me	k62jg3815xttdxxi62.name	v1coxk38psbf.com
jd62a23a1vtlsfwdffc.net	e93jgefyqja1ae23.name	ehscoyeyfebs8c.info
ngb2a23uokcgra.me	kipjgitscqwqbqc.info	bqfcpdjqbruyrxro.name
lqp2aicjpnqjbdn.info	bkijgpuqkob6ggu.me	wpicpero85aes.name
31o2akkkrntwjta0e.name	khpjgujie0fvjak.com	etjcpgtlxkxfctkn.net
qbd2aqefaluut.me	ca1jgxvqkahrwbt.name	vmgcptubdtwy.me
dqd2aut7eud9i85.me	lotjhcw15dyfa8c.net	v70crggjpmkm77u69.net
saf2avc7eqwhm00q.me	pjkjhtnse7cvnsm31.com	pg1cs38fjgnd9gd2uj.net
yhd2be7uvpfon.me	jaojikgf5hcor.net	eklcysdnirtpfp.com
dx62gucdurjm85.net	vawjk8ccbogfcpcn.name	em1ctbc4cjohkj.name
us62ialpkkijkvp.net	huqjkgafafc431e7.info	vdcdtyccqsesy.name
rc62l07cbfn703fwojux.com	mvejkuwgtqyd54s.net	e7ocucfmlikv.info
sbd2mcjchjooqxi.me	rwkjl07qdybe7od9hh.me	oe1cucqycxkw.me
vl62pe7pa70dbe0pmn.com	hpkjicedjbq.net	gfkcul93w4deeatmr.info
xf82svlf31vfcwi3f.me	mrljmdgdagry.info	pj1cv54vurdss.com
iad2und9c4slv77eymf.net	lmijmissbx70kiq.net	lt1cvepbvcer.info
imd2uoxp6954vv.net	jedjn31bgqmxuaj77.name	opncvgyfvjseim.net
su62vdxcrc62hny.info	qyajn70ljkv5bibddb.me	erkcvjk1cpjhvlva8.name
cb62xbfpuixpde7eb.info	brojodmncnoj.name	bxwcvcocqi31r.me
lf62xyh9aveaplxqc.info	upyjofwf5wcdl.net	54ucvrxiqqomr.net
l5b3123ojbmobsa8ylw.info	07ojonrfpdwrwx54t.info	gh1cvue23esxi.info
hqj3146mvb31gley.net	agtjorbdka77dak.me	vygcwabmh6vcnxm.me
69p31envphfnm.me	kcgjp9axa8oooy.me	psscwcercxbd4dmq.net
jfg31gwasnbwkr.com	c1cjpm0ecf569ibdjc.net	ysdcwvxle77lb.me
aab31mha5bwtdgeil.com	fvfjptrqrqrgadh.net	38pcxnjtcbccbjoe.info
wmi31tfmbnhf1c.net	vrejpsgtpcavv.name	ypocxunih1cu.net
gp2331svxj69xj0e.net	yuijptaa8yntj.name	fhdcxyifxggf46b.info
wb63831qaa1a1eokm.com	gdkjptvxyiqyci38.com	pgwcy4dnkmbe.net
jkp38cc859aed15vp.name	fkmjpwud9lgcb.name	f5scy62fcfthkdd2ndrx.me
uae38gme7eirhcb07x.net	emnjrknbare0.me	wfecybgpslvf.name
1cc38hmvsxf5imp.net	eeijrsq2a07vbp.net	ujrcyhkkqrb.net
e0i38lehcgofwt.info	ykpjta1hb6sckos.com	hrqcyhqtlla8et.net
bbd38n69crspcw.net	fbcjtcaobkicn.net	b77cyjkj2avjifcp.info
fcc38nsncrswkxg.net	r2ajtepqe0ddd9c.com	ltfcylllwebxu4dd.me
lvb38pre7bfxnlu.me	evmjtmfambkbu.com	00hcypwxhlhyrqsx.com
ecn38rjma8nc4c7evmo.name	85fju46b2aeeohu0e.com	ebwd07kijbxeeexl.info
ic93cdfxkddeqmxi.com	poujuh70ophrbr.net	febdb0edwrscwix.net
lq93cw7emnjfdt.net	obrjujwwqppof.net	bksd15pivrauv.com
jn93edbtxusbcpcq.net	qwdjvnc4ecgs.name	idfd23cgsof46d.net
aw93eoq38x1chnijsb.info	bdtjw31p8cb6axgl77.info	fbdd2auxsxwi69vh.net
raf3f70bqpv70cmd8c.name	xkbjwpycponuox.me	ftwd2axiaanw.info
bm23fafyjkpufysh.com	fekjwxomhtqyss.me	bmttd2ecxbqk7e.info
fw93fchcicu9aoj.me	lwvjxycdnatl.me	wdod2eenukmexgdr.com

f463fge0uxjbekt.net	62ajxojaf7eje.info	qusd2fl46mgtbd.name
xrb3fivsurd1cjqa.me	b6ujxbapqme7uym8c.name	wvcd2htm15cme7.net
vta3fjhwc7ef07wf5afd.me	d9njyqpodmc317epg.me	lxkd2ilfe0hjwrmrd.info
xoc3fm46aqffgk.info	fryjyxngul.com	bb6d2jchlf5rcmqcim.name
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Appendix C

Int. Cls.: 9 and 42

Prior U.S. Cls.: 26, 38 and 101

United States Patent and Trademark Office

Reg. No. 1,200,236
Registered Jul. 6, 1982

**TRADEMARK
SERVICE MARK
Principal Register**

MICROSOFT

Microsoft (partnership)
Suite 819
10800 NE. 8th
Bellevue, Wash. 98004

VICES, in CLASS 42 (U.S. Cl. 101).
First use Nov. 12, 1975; in commerce Nov. 12,
1975.

For: COMPUTER PROGRAMS, in CLASS 9
(U.S. Cls. 26 and 38).
First use Nov. 12, 1975; in commerce Nov. 12,
1975.

For: COMPUTER PROGRAMMING SER-

Ser. No. 236,080, filed Oct. 22, 1979.

B. H. VERTIZ, Primary Examiner

CHERYL LYNNE HENDERSON, Examiner

Int. Cls.: 9 and 42

Prior U.S. Cls.: 26, 38 and 101

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First use Nov. 12, 1975; in commerce Nov. 12,
1975.

Ser. No. 236,080, filed Oct. 22, 1979.

B. H. VERTIZ, Primary Examiner

For: COMPUTER PROGRAMMING SER- CHERYL LYNNE HENDERSON, Examiner

Int. Cls.: 35 and 38

Prior U.S. Cls.: 100, 101, 102 and 104

Reg. No. 2,165,601

United States Patent and Trademark Office

Registered June 16, 1998

**SERVICE MARK
PRINCIPAL REGISTER**

HOTMAIL

**HOTMAIL CORPORATION (CALIFORNIA
CORPORATION)
1290 OAKMEAD PARKWAY, SUITE 218
SUNNYVALE, CA 94086**

**FOR: ADVERTISING AND MARKETING
SERVICES, NAMELY, PROMOTING THE
GOODS AND SERVICES OF OTHERS BY
PLACING ADVERTISEMENTS AND PROMO-
TIONAL DISPLAYS IN AN ELECTRONIC SITE
ACCESSED THROUGH COMPUTER NET-
WORKS AND BY DELIVERING ADVERTISE-
MENTS AND PROMOTIONAL MATERIALS TO**

**OTHERS VIA ELECTRONIC MAIL, IN CLASS
35 (U.S. CLS. 100, 101 AND 102).**

**FIRST USE 7-4-1996; IN COMMERCE
7-4-1996.**

**FOR: ELECTRONIC MAIL SERVICES, IN
CLASS 38 (U.S. CLS. 100, 101 AND 104).**

**FIRST USE 7-4-1996; IN COMMERCE
7-4-1996.**

SER. NO. 75-272,783, FILED 4-10-1997.

EDWARD NELSON, EXAMINING ATTORNEY